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Attorneys for Defendant
LEXAR MEDIA, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

JENS ERIK SORENSEN, as Trustee of
SORENSEN RESEARCH AND
DEVELOPMENT TRUST,

Plaintiff,

v.

LEXAR MEDIA, INC., a Delaware corporation;
and DOES 1 - 100,

Defendants.

Case No. C08-00095 JW RS

DECLARATION OF JOSEPH H. LEE IN
SUPPORT OF DEFENDANT LEXAR
MEDIA'S MISCELLANEOUS
ADMINISTRATIVE REQUEST TO FILE
DOCUMENTS UNDER SEAL

Date: September 8, 2008
Time: 9:00 a.m.
Courtroom: 8, 4th Floor
Judge: Hon. James Ware

1 I, Joseph H. Lee, declare:

2 1. I am a member of the Bar of this Court and an associate with the law firm
3 of Weil, Gotshal & Mnages LLP, counsel of record for Lexar Media, Inc. ("Lexar") in the above-
4 captioned matter. I submit this declaration based on personal knowledge and following a
5 reasonable investigation. If called upon as a witness, I could competently testify to the truth of
6 each statement herein.

7 2. Lexar hereby requests, pursuant to Civil Local Rules 7-11 and 79-5, an
8 order sealing Exhibits A through F to the Declaration of Joseph Lee filed in connection with
9 Lexar Media's Supplemental Statement In Opposition To Plaintiff's Motion For Application Of
10 35 U.S.C. § 295 Presumption Of Infringement.

11 3. Upon information and belief, the documents mentioned in paragraph 2
12 above, contain information that has been designated as "Confidential" or "Highly Confidential -
13 Attorneys' Eyes Only" under the Protective Order in this case, and relate to the process by which
14 the product accused by the Plaintiff of being made by an infringing process is manufactured. The
15 disclosure of these documents, for instance, to competitors or others in the industry, may harm
16 Lexar and/or its suppliers.

17 4. This request is narrowly tailored to seal only that material for which good
18 cause to seal has been established.

19 I declare under penalty of perjury under the laws of the United States of America
20 that the foregoing is true and correct.

21 Executed on August 29, 2008 at Redwood Shores, California.

22
23 */s/ Joseph H. Lee*

24 Joseph H. Lee

25 joseph.lee@weil.com
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